

MEMO ENDORSED

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March 21, 2020

VIA ECF

The Honorable Valerie E. Caproni
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

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Re: *Rusis et al v. International Business Machines Corp.*, No. 1:18-CV-08434
Defendant IBM's Motion For Adjournment Of Initial Pretrial Conference

Dear Judge Caproni:

Defendant International Business Machines Corporation ("IBM") respectfully requests an adjournment of the initial pretrial conference scheduled for April 24, 2020, at 10:00 a.m. IBM is requesting an adjournment because the undersigned counsel will be participating in a previously-scheduled mediation on the same day. This is the first request for an adjournment of this initial pretrial conference.

Pursuant to Your Honor's Individual Practices, IBM has conferred with Plaintiffs' counsel, and respectfully proposes May 1, 2020 as the alternative date for the conference. Plaintiffs' counsel consents to the adjournment request, and has confirmed that she is available on May 1, 2020.

We thank the Court for its consideration of this matter.

Respectfully submitted,

/s/ Matthew W. Lampe
Matthew W. Lampe

cc: All counsel of record (via ECF)

Application GRANTED. The IPTC is adjourned to **May 1, 2020, at 10:00 a.m.** The parties' preconference letter and CMP are due no later than **April 23, 2020.**

SO ORDERED.


3/23/2020

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE